

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	CASE NO.
UTILITIES COMPANY FOR AN ADJUSTMENT OF	)	2018-00294
ITS ELECTRIC RATES	)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO CHARTER COMMUNICATIONS OPERATING LLC

Charter Communications Operating, LLC (Charter), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on February 14, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Charter shall make timely amendment to any prior response if Charter obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Charter fails or refuses to furnish all or part of the requested information, Charter shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

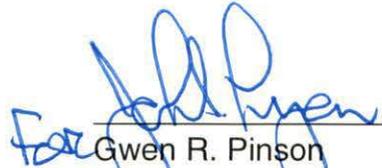
Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Charter shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Joseph H. Crone III (Crone Testimony), pages 3 and 6. State whether Charter would still object to having to give Kentucky Utilities Company (KU) one weeks' notice prior to performing any make-ready work if KU bore the cost of the inspector. If so, state whether there is an amount of notice time that would be acceptable to Charter.

2. Refer to the Crone Testimony, page 3. Provide the number of times in 2017 and 2018 that KU failed to perform the necessary make-ready work within 60 days of receipt of the Attachment Customer's payment of make-ready costs.

3. Refer to the Crone Testimony pages 3–4.

- a. Provide the number of times in 2017 and 2018 that the work performed in the field was altered from the previously approved manner.
  - b. Provide an example of why changes would occur in the field.
4. Refer to the Crone Testimony, pages 8 through 10. Describe the incentives Attachment Customers have to comply with applicable permitting processes.
5. Refer to the Crone Testimony, page 10.
  - a. Provide the number of times in 2017 and 2018 that Charter had noncompliant attachments that KU repaired.
  - b. Provide the total amount billed to Charter in 2017 and 2018 for noncompliant attachments that KU repaired
6. Refer to the Crone Testimony, pages 13 and 14. Explain how Charter believes KU should determine the costs of an audit that would be appropriate to charge to Attachment Customers.
7. Refer to the Crone Testimony, pages 13–14. Provide a percentage estimate of value of the audit that directly benefits an attachment customer. Provide all supporting workpapers that support this percentage.
8. Provide the number of unauthorized attachments that KU found in an audit for years 2017 and 2018.
9. Refer to the Crone Testimony, page 14. Mr. Crone states that the electric rates to Charter will increase. Provide an estimated quantification of how much Charter's rates will increase during the test year. Provide all workpapers supporting this quantification.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED JAN 31 2019

cc: Parties of Record

\*Allyson K Sturgeon  
Senior Corporate Counsel  
Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202

\*G. Houston Parrish  
Labor Law Attorney  
Office of the Staff Judge Advocate, B  
50 3rd Avenue  
Fort Knox, KENTUCKY 40121

\*Kent Chandler  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Iris G Skidmore  
Bates & Skidmore  
415 W. Main Street  
Suite 2  
Frankfort, KENTUCKY 40601

\*Hannah Wigger  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Avenue NW, Suite 1  
Washington, DISTRICT OF COLUMBIA 20006

\*Larry Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*William H May, III  
Hurt, Deckard & May  
The Equus Building  
127 West Main Street  
Lexington, KENTUCKY 40507

\*Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Laurence J Zielke  
Zielke Law Firm PLLC  
1250 Meidinger Tower  
462 South Fourth Avenue  
Louisville, KENTUCKY 40202

\*Barry Alan Naum  
Spilman Thomas & Battle, PLLC  
1100 Brent Creek Blvd., Suite 101  
Mechanicsburg, PENNSYLVANIA 17050

\*Janice Theriot  
Zielke Law Firm PLLC  
1250 Meidinger Tower  
462 South Fourth Avenue  
Louisville, KENTUCKY 40202

\*Mark E Heath  
Spilman Thomas & Battle, PLLC  
300 Kanawha Blvd, East  
Charleston, WEST VIRGINIA 25301

\*Carrie M Harris  
Spilman Thomas & Battle, PLLC  
1100 Brent Creek Blvd., Suite 101  
Mechanicsburg, PENNSYLVANIA 17050

\*Justin M. McNeil  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Don C A Parker  
Spilman Thomas & Battle, PLLC  
1100 Brent Creek Blvd., Suite 101  
Mechanicsburg, PENNSYLVANIA 17050

\*Honorable Kurt J Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Honorable Matthew R Malone  
Attorney at Law  
Hurt, Deckard & May  
The Equus Building  
127 West Main Street  
Lexington, KENTUCKY 40507

\*Emily W Medlyn  
General Attorney  
U.S. Army Legal Services Agency Regul  
9275 Gunston Road  
Fort Belvoir, VIRGINIA 22060

\*Honorable Kendrick R Riggs  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

\*Paul Werner  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Avenue NW, Suite 1  
Washington, DISTRICT OF COLUMBIA 20006

\*Rebecca W Goodman  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Honorable Robert C Moore  
Attorney At Law  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KENTUCKY 40602-0634

\*Robert M Conroy  
Director, Rates  
Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202

\*Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*M. Todd Osterloh  
Sturgill, Turner, Barker & Moloney, PLLC  
333 West Vine Street  
Suite 1400  
Lexington, KENTUCKY 40507